

# Exhibit I

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**From:** Brian Robison <brian@brownfoxlaw.com>  
**Sent:** Monday, June 13, 2022 2:12 PM  
**To:** Moore, Elizabeth; Kopp, Christopher; Yu, Minae; Parker, Richard G.; Lipton, Joshua; Jordan Campbell; Charlene Koonce; Margaret Mead  
**Cc:** Iovieno, Philip; Stern, Jack; Singer, Mark; Andrijauskaite, Zygimante  
**Subject:** RE: In re Pork Antitrust Litigation, 0:18-cv-01776 - Smithfield Productions

Elizabeth:

I am writing in response to David Eddy's letter from May 31. As you know by now, the parties negotiated at length last year over the scope of the defendants' data productions, and Smithfield relied upon agreements reached during those talks in producing its voluminous transaction data from multiple different databases. Smithfield substantially completed its data productions by September 1, 2021, other than a few small, straggler data productions that came later. Smithfield is not willing to incur the cost and hassle of restarting its data productions at this late stage. This is one of many issues on which late-arriving plaintiffs cannot be allowed to upset discovery agreements (and their associated tradeoffs) that the parties reached before their arrival. Smithfield has worked with the new DAPs on discrete discovery issues like new search terms targeted to the new DAPs, but another data production is a different matter. Finally, you are correct that the public settlement agreements that Smithfield signed with the DPPs and the Commercial IPPs contained a broader definition of pork than the parties have been litigating, but as part of those settlements, Smithfield did not produce the sort of granular, invoice-level detail on non-litigated pork products that the DAPs are apparently seeking through their RFPs and David's letter. I am happy to talk further if you think that would be productive.

Brian



BRIAN E. ROBISON

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**From:** Moore, Elizabeth <Elizabeth.Moore@cwt.com>  
**Sent:** Friday, June 10, 2022 11:02 AM  
**To:** Kopp, Christopher <CKopp@gibsondunn.com>; Yu, Minae <MYu@gibsondunn.com>; Parker, Richard G. <RParker@gibsondunn.com>; Lipton, Joshua <JLipton@gibsondunn.com>; Brian Robison <brian@brownfoxlaw.com>; Jordan Campbell <jordan@brownfoxlaw.com>; Charlene Koonce <charlene@brownfoxlaw.com>; Margaret Mead <margaret@brownfoxlaw.com>  
**Cc:** Iovieno, Philip <Philip.Iovieno@cwt.com>; Stern, Jack <Jack.Stern@cwt.com>; Singer, Mark <Mark.Singer@cwt.com>; Andrijauskaite, Zygimante <Zygimante.Andrijauskaite@cwt.com>  
**Subject:** RE: In re Pork Antitrust Litigation, 0:18-cv-01776 - Smithfield Productions

Chris,

Thank you for this information. Please let us know Smithfield's response to the attached letter from David Eddy. We understand that Smithfield may have use a broad definition of Pork products in settling certain class cases so hopefully David's request can be addressed.

Regards,

Elizabeth

**Elizabeth Moore**

*Associate*

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**From:** Kopp, Christopher <[CKopp@gibsondunn.com](mailto:CKopp@gibsondunn.com)>

**Sent:** Monday, June 6, 2022 6:18 PM

**To:** Moore, Elizabeth <[Elizabeth.Moore@cwt.com](mailto:Elizabeth.Moore@cwt.com)>; Yu, Minae <[MYu@gibsondunn.com](mailto:MYu@gibsondunn.com)>; Parker, Richard G. <[RParker@gibsondunn.com](mailto:RParker@gibsondunn.com)>; Lipton, Joshua <[JLipton@gibsondunn.com](mailto:JLipton@gibsondunn.com)>

**Cc:** Iovieno, Philip <[Philip.Iovieno@cwt.com](mailto:Philip.Iovieno@cwt.com)>; Stern, Jack <[Jack.Stern@cwt.com](mailto:Jack.Stern@cwt.com)>; Singer, Mark

<[Mark.Singer@cwt.com](mailto:Mark.Singer@cwt.com)>; Andrijauskaite, Zygimante <[Zygimante.Andrijauskaite@cwt.com](mailto:Zygimante.Andrijauskaite@cwt.com)>; [brian@brownfoxlaw.com](mailto:brian@brownfoxlaw.com)

**Subject:** RE: In re Pork Antitrust Litigation, 0:18-cv-01776 - Smithfield Productions

Elizabeth –

We have produced all of the sales data referenced below, including the data regarding the plant located in Des Moines. Separately, we plan to produce in the next week or two about 200 emails that we've gathered from a custodian's personal gmail account. But aside from that, we have produced all documents.

Best,  
Chris

**Christopher Kopp**

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**From:** Moore, Elizabeth <[Elizabeth.Moore@cwt.com](mailto:Elizabeth.Moore@cwt.com)>

**Sent:** Friday, June 3, 2022 2:17 PM

**To:** Yu, Minae <[MYu@gibsondunn.com](mailto:MYu@gibsondunn.com)>; Parker, Richard G. <[RParker@gibsondunn.com](mailto:RParker@gibsondunn.com)>; Lipton, Joshua <[JLipton@gibsondunn.com](mailto:JLipton@gibsondunn.com)>; Kopp, Christopher <[CKopp@gibsondunn.com](mailto:CKopp@gibsondunn.com)>

**Cc:** Iovieno, Philip <[Philip.Iovieno@cwt.com](mailto:Philip.Iovieno@cwt.com)>; Stern, Jack <[Jack.Stern@cwt.com](mailto:Jack.Stern@cwt.com)>; Singer, Mark

<[Mark.Singer@cwt.com](mailto:Mark.Singer@cwt.com)>; Andrijauskaite, Zygimante <[Zygimante.Andrijauskaite@cwt.com](mailto:Zygimante.Andrijauskaite@cwt.com)>; [brian@brownfoxlaw.com](mailto:brian@brownfoxlaw.com)

**Subject:** RE: In re Pork Antitrust Litigation, 0:18-cv-01776 - Smithfield Productions

**[WARNING: External Email]**

Hi Minae,

I hope you're well. Can you please confirm whether Smithfield has produced all documents, and if not, when you anticipate completion of all productions?

Regards,  
Elizabeth

**Elizabeth Moore**

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**From:** Yu, Minae <[MYu@gibsondunn.com](mailto:MYu@gibsondunn.com)>

**Sent:** Friday, April 15, 2022 1:48 PM

**To:** Moore, Elizabeth <[Elizabeth.Moore@cwt.com](mailto:Elizabeth.Moore@cwt.com)>; Parker, Richard G. <[RParker@gibsondunn.com](mailto:RParker@gibsondunn.com)>; Lipton, Joshua <[JLipton@gibsondunn.com](mailto:JLipton@gibsondunn.com)>; Kopp, Christopher <[CKopp@gibsondunn.com](mailto:CKopp@gibsondunn.com)>

**Cc:** Iovieno, Philip <[Philip.Iovieno@cwt.com](mailto:Philip.Iovieno@cwt.com)>; Stern, Jack <[Jack.Stern@cwt.com](mailto:Jack.Stern@cwt.com)>; Singer, Mark <[Mark.Singer@cwt.com](mailto:Mark.Singer@cwt.com)>; Andrijauskaite, Zygimante <[Zygimante.Andrijauskaite@cwt.com](mailto:Zygimante.Andrijauskaite@cwt.com)>; [brian@brownfoxlaw.com](mailto:brian@brownfoxlaw.com)

**Subject:** RE: In re Pork Antitrust Litigation, 0:18-cv-01776 - Smithfield Productions

Elizabeth,

Thank you for your patience while we looked into the questions you raised during the parties' meet and confer. As I explained to you at that time, Smithfield has already produced documents responsive to RFP No. 29 that are in Smithfield's possession, including but not limited to SMITHFIELD04625054-SMITHFIELD04625069 and SMITHFIELD04771010. This week, we also produced SMITHFIELD04970671-SMITHFIELD04970672. Smithfield's sales data also covers some of the information requested in RFP No. 29. As you can see from these documents, Smithfield has produced data covering 2005 to 2020. In addition, we anticipate producing some additional data for one plant located in Des Moines, which we expect to complete by the end of this month. Please let us know if you have any questions.

Regards,

Minae

Minae Yu

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**From:** Moore, Elizabeth <[Elizabeth.Moore@cwt.com](mailto:Elizabeth.Moore@cwt.com)>

**Sent:** Tuesday, April 12, 2022 9:15 AM

**To:** Parker, Richard G. <[RParker@gibsondunn.com](mailto:RParker@gibsondunn.com)>; Lipton, Joshua <[JLipton@gibsondunn.com](mailto:JLipton@gibsondunn.com)>; Yu, Minae <[MYu@gibsondunn.com](mailto:MYu@gibsondunn.com)>; Kopp, Christopher <[CKopp@gibsondunn.com](mailto:CKopp@gibsondunn.com)>

**Cc:** Iovieno, Philip <[Philip.Iovieno@cwt.com](mailto:Philip.Iovieno@cwt.com)>; Stern, Jack <[Jack.Stern@cwt.com](mailto:Jack.Stern@cwt.com)>; Singer, Mark <[Mark.Singer@cwt.com](mailto:Mark.Singer@cwt.com)>; Andrijauskaite, Zygimante <[Zygimante.Andrijauskaite@cwt.com](mailto:Zygimante.Andrijauskaite@cwt.com)>

**Subject:** In re Pork Antitrust Litigation, 0:18-cv-01776 - Smithfield Productions

[WARNING: External Email]

Counsel,

Please see the attached correspondence.

Regards,  
Elizabeth

**Elizabeth Moore**

*Associate*

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